

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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(Admissions *pro hac vice* pending)

*PROPOSED ATTORNEYS FOR DEBTOR*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>  
Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

LTL MANAGEMENT LLC,  
Plaintiff,  
v.

Adv. No. 23-01092 (MBK)

THOSE PARTIES LISTED ON APPENDIX A TO  
COMPLAINT and JOHN AND JANE DOES 1-1000,  
Defendants.

**APPLICATION FOR ORDER SHORTENING TIME**

**TO: THE HONORABLE MICHAEL B. KAPLAN  
CHIEF UNITED STATES BANKRUPTCY JUDGE**

The above-captioned debtor (the “Debtor”), by and through its undersigned counsel,

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

respectfully request that the Court, pursuant to Fed. R. Bankr. P 9006(c)(1), shorten the time period to notice a hearing on the *Debtor's Motion for an Order Authorizing the Filing Under Seal of Certain Confidential Exhibits Related to Debtor's Complaint for Injunctive Relief and Related Motion* (the "Motion")<sup>2</sup> that is otherwise required by D.N.J. LBR 9013-2(a), for the reasons set forth below:

1. A shortened hearing time is requested because: The Debtor seeks the sealing of the Confidential Documents which are among those exhibits previously provided to the Court under seal<sup>3</sup> and admitted into evidence in connection with the November 4-5, 2021, and February 14-18, 2022, hearings requesting the same relief as that requested in this adversary proceeding in the Debtor's prior chapter 11 case. See In re LTL Mgmt. LLC, No. 21-30589 (MBK) [Dkt. 1497] (Bankr. D.N.J. 2022). The Confidential Documents consist of sensitive commercial documents, including information regarding the Debtor's and its non-debtor affiliates' insurance coverage and commercial agreements with various third parties, including (a) Pharma Tech Industries, Inc.; (b) Bausch Health Companies (f/k/a Valeant Pharmaceuticals); and (c) Valeant Pharmaceuticals International, Inc. Disclosure of the Confidential Documents may (i) violate third-party obligations and/or agreements, (ii) impose other economic or competitive harm relating to claim resolution, (iii) damage business relationships, (iv) damage commercial standing, and/or (v) damage negotiation positions. A shortened hearing time is appropriate in this situation because the underlying motion, to which the proposed sealed exhibits support, is currently scheduled to be heard on April 18, 2023.

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<sup>2</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

<sup>3</sup> LTL Mgmt. LLC v. Those Parties Listed on Appendix A to Complaint (In re LTL Mgmt. LLC), No. 21-3032 (MBK) [Dkt. 175] (Bankr. D.N.J. 2022) (granting Debtor's motion to seal the same Confidential Documents).

2. State the hearing dates requested: The Debtor respectfully requests that the Court hear the Motion on April 18, 2023, or on a date and time that is most convenient for the Court.

3. Reduction of the time period is authorized under Fed. R. Bankr. P. 9006(c)(1).  
The applicant requests entry of the proposed order shortening time.

Dated: April 5, 2023

**WOLLMUTH MAHER & DEUTSCH LLP**

/s/ Paul R. DeFilippo

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